

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

CHIRAG SHAH,

Plaintiff,

vs.

SOUTHWEST AIRLINES, *et al.*,

Defendants.

Civil Action No. 1:13CV1481 AJT/JFA

**RULE 26(a)(3) DISCLOSURES**

Southwest Airlines Co. (“Southwest”), pursuant to Rule 26 of the Federal Rules of Civil Procedure and the Court’s January 17, 2014 Order, hereby makes the following pre-trial disclosures:

**I. WITNESSES**

<i>Name</i>	<i>May Present (M)/Will Present (W)</i>	<i>Expected to be presented by Deposition (Y/N)</i>
Ava Alley	M	Y
Elizabeth Behrens	M	N
Elaine Bohlin	M	N
Ruby Boykin	M	N
George Cannon	W	N
John Chausee	W	N
Brent Harper	W	N
Tim Leonard	M	N
Mary Mortenson	M	N
Regina Paschall	W	N
Shannon Ramos	W	N
Susan Saavedra	M	N
Chirag Shah	M	Y

**II. EXHIBITS**

Number	Description	Bates or Exhibit Nos.
1	George Cannon's Flight Operations IR Summary Report	SWA000003-000005
2	Regina Paschall IR # 173349	SWA000009-000011
3	Shannon Ramos IR # 173475	SWA000006-000008
4	Jason Hartman IR # 042587	SWA000019-000020
5	FOM Section 21.6.6	SWA000023-000025
6	Southwest Contract of Carriage	SWA000026-000062
7	FAM Section 1.20 and 1.2.1	SWA000082
8	Inflight Initial Training Leader's Guide p. 5	SWA000135
9	CIRRUS Itinerary	SWA000199-000205
10	Web Form Complaint	Shah #1
11	Apr. 16, 2013 at 10:50 am Response to Your Inquiry	Shah #2
12	Email from Lisa Keegan to Chirag Shah	SWA000206
13	Email from Lisa Keegan to Chirag Shah	Shah #3
14	Email from Lauren to Chirag Shah	SWA000207
15	Request for Response	SWA000208
16	Request for Reports	SWA000339-000341
17	Email from Trey Shaw to Deborah Edwards et al. (Apr. 30, 2013)	SWA000320-000321
18	Email from Elise May to Trey Shaw (Apr. 30, 2013)	SWA000324-000325
19	Email from Ted Thornton to Trey Shaw (May 3, 2013)	SWA000326-000327
20	SR 213659802352 Communications	SWA000344-000345
21	May 16, 2013 3:09 pm Email from Elizabeth Behrens	Shah #4
22	MWAA Police Report	SWA000347-000348
23	Policy Concerning Harassment, etc.	SWA000374
24	Southwest Airlines Safety & Security Commitment	SWA000383
25	Cabin Diagram	Shah #5
26	Expert Report of Tim Leonard	From Southwest's Expert Disclosures
27	Expert Report of Brent Harper	From Southwest's Expert Disclosures
28	Expert Report of John Chaussee	From Southwest's Expert Disclosures
29	TSA Layers of Security Graphic	From John Chaussee's report
28	Southwest reserves the right to offer any of the documents that were submitted to the Transportation Security Administration for Sensitive Security Information review if such use is authorized by the TSA	
29	Southwest reserves the right to offer any exhibit listed by the plaintiff	
30	Southwest reserves the right to offer any exhibit that in fairness should be allowed	

Dated: June 18, 2014

SOUTHWEST AIRLINES CO.  
By Counsel

SCHNADER HARRISON SEGAL & LEWIS LLP

By: /s/ *Jonathan M. Stern*

Jonathan M. Stern (Va. Bar No. 41930)

750 Ninth Street, NW

Suite 550

Washington, DC 20001

Telephone: (202) 419-4202

Telefax: (202) 419-4252

Email: [jsstern@schnader.com](mailto:jsstern@schnader.com)

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 18th day of June 2014, I filed this Disclosure using the Court's ECF filing system, which will provide a copy to:

Thomas R. Breeden, Esq.  
Thomas R. Breeden, P.C.  
10326 Lomond Drive  
Manassas, Virginia 20109  
Telephone: (703) 361-9277; Telefax: (703) 257-2259  
trb@tbreedenlaw.com

By: /s/ Jonathan M. Stern

Jonathan M. Stern (Va. Bar No. 41930)  
SCHNADER HARRISON SEGAL & LEWIS LLP  
750 Ninth Street, NW  
Suite 550  
Washington, DC 20001  
Telephone: (202) 419-4202  
Telefax: (202) 419-4252  
Email: jstern@schnader.com  
Counsel for Southwest Airlines Co.